

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

THE ESTATE OF JAMES FRANKLIN
PERRY, by BETTIE A. RODGERS,
SPECIAL ADMINISTRATOR, and JAMES
FRANKLIN PERRY, JR. (A MINOR),

Plaintiffs,

Case No. 12-CV-664

v.

CHERYL WENZEL, RN, *et al.*,

Defendants.

DECLARATION OF ANDREW A. JONES

ANDREW A. JONES declares pursuant to 28 U.S.C. § 1746 and under penalty of perjury that the following is true and correct:

1. I am one of the attorneys for defendants Cheryl Wenzel, Nicole Virgo, Tina Watts, Fatrena Hale, Kelly Kieckbusch, Abie Douglas, Anthony Arndt, Sheila Jeff, Darius Holmes, Richard R. Schmidt, David A. Clarke, Jr., Milwaukee County, and Wisconsin County Mutual Insurance Corporation in the above-captioned matter.

2. I make this declaration based upon my personal knowledge of the facts attested to herein.

3. Attached hereto as **Exhibit 1** is a CD containing true and accurate copies of excerpts from the video recordings of various depositions taken in this case. Each of the excerpts is identified by reference to the name of the deponent, followed by a number designating the clip in question (*i.e.*, “Schmidt 1”).

4. Attached hereto as **Exhibit 2** is a true and correct copy of a letter dated December 18, 2015, from James Gende addressed to Milwaukee County Sheriff David A. Clarke, Jr.

Dated this 28th day of December, 2015.

s/ Andrew A. Jones

Andrew A. Jones